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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF STEPHEN GEORGE IN
SUPPORT OF REORGANIZED DEBTORS'
SIXTY-SEVENTH OMNIBUS OBJECTION
TO CLAIMS (PLAN PASSTHROUGH
WORKERS' COMPENSATION CLAIMS)**

**Response Deadline:
March 24, 2021, 4:00 p.m. (PT)**

Hearing Information If Timely Response Made:

Date: April 7, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Stephen George, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am Senior Manager, Enterprise Health, at Pacific Gas and Electric Company (the
5 “**Utility**,” and, with PG&E Corporation as debtors and reorganized debtors, the “**Debtors**,” or, as
6 reorganized pursuant to the Plan, “**PG&E**” or the “**Reorganized Debtors**” in the above-captioned
7 chapter 11 cases (the “**Chapter 11 Cases**”)). I submit this Declaration in support of the *Reorganized*
8 *Debtors’ Sixty-Seventh Omnibus Objection to Claims (Plan Passthrough Workers’ Compensation*
9 *Claims)* (the “**Omnibus Objection**”),¹ filed contemporaneously herewith.

10 2. In my current position, I am responsible for overseeing all matters relating to workers’
11 compensation, including [add detail]. Except as otherwise indicated herein, all facts set forth in this
12 Declaration are based upon my personal knowledge, the knowledge of other Utility personnel working
13 under and alongside me on this matter, my discussions with PG&E’s professionals and various other
14 advisors and counsel, and my review of relevant documents and information. If called upon to testify, I
15 would testify competently to the facts set forth in this Declaration. I am authorized to submit this
16 declaration on behalf of the Reorganized Debtors.

17 3. My team and I worked with PG&E advisors and professionals, to review the list of
18 Workers’ Compensation Claims under the Plan, comprising of HoldCo Workers’ Compensation Claims
19 and Utility Workers’ Compensation Claims, to ensure its completeness and accuracy. For both types of
20 Workers’ Compensation Claims, holders are entitled to pursue their claims against the Reorganized
21 Debtors as if the Chapter 11 Cases had not been commenced. The list formed the basis of Exhibit 1 to
22 the Omnibus Objection.

23 4. The Omnibus Objection is directed at Proofs of Claim specifically identified in
24 **Exhibit 1** to the Omnibus Objection, in the column headed “Claims To Be Expunged,” and referred to
25 in the Omnibus Objection as “Plan Passthrough Workers’ Compensation Claims.” **Exhibit 1** was
26 prepared by PG&E advisors and professionals from information provided by me, and I have reviewed it

27 _____
28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
the Omnibus Objection.

1 to confirm its accuracy. I am familiar with it, its contents, and the process under which it was prepared.
2 To the best of my knowledge, information and belief, **Exhibit 1** accurately identifies HoldCo and the
3 Utility Workers' Compensation Claims designated as such in the Plan.

4 5. Each of the Plan Passthrough Workers' Compensation Claims identified on **Exhibit 1**
5 will pass through the Chapter 11 Cases unaffected by the Plan, as provided for in sections 4.9 and 4.28
6 of the Plan. As stated expressly in these sections, these Claims are unimpaired, and the holders of these
7 Claims are free to pursue them unaffected by the Plan.

8 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
9 correct to the best of my knowledge, information, and belief. Executed this twenty-fifth day of February,
10 2021, in Galt, California.

11 /s/ Stephen George
Stephen George